

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	
<b>STANLEY CHARLES AMEY SR.</b>	:	<b>CASE NO. 1-20-03217-HWV</b>
<b>aka STAN C. AMEY</b>	:	
<b>Debtor</b>	:	<b>CHAPTER 13</b>
	:	
<b>U.S. BANK TRUST NATIONAL</b>	:	
<b>ASSOCIATION, AS TRUSTEE OF CVI LCF</b>	:	
<b>MORTGAGE LOAN TRUST I, BY ITS</b>	:	
<b>SERVICER NEWREZ LLC, d/b/a</b>	:	
<b>SHELLPOINT MORTGAGE SERVICING</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>STANLEY CHARLES AMEY SR.</b>	:	
<b>aka STAN C. AMEY</b>	:	
<b>Respondent</b>	:	

**DEBTOR'S RESPONSE TO MOTION OF U.S. BANK TRUST NATIONAL  
ASSOCIATION, AS TRUSTEE OF CVI LCF MORTGAGE LOAN TRUST I,  
BY ITS SERVICER NEWREZ LLC, D/B/A SHELLPOINT MORTGAGE SERVICING  
FOR RELIEF FROM THE AUTOMATIC STAY**

**AND NOW**, comes Debtor, Stanley Charles Amey, Sr., by and through his attorney, Gary

J. Imblum, and respectfully responds as follows:

1. Admitted in part and denied in part. Debtor has no knowledge as to the servicer.

Strict proof is demanded.

2. Admitted.

3. Ad

4. Admitted in part and denied in part. Debtor has no knowledge as to the assignment

or present holder of the mortgage. Strict proof is demanded.

5. Admitted.

6. Admitted. Further, Debtor will forward funds to his counsel sufficient to pay the arrearage through March in full.

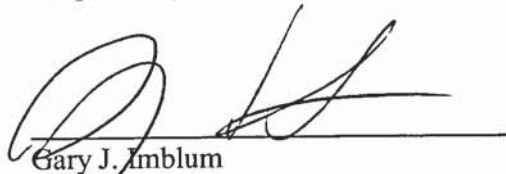
7. Admitted in part and denied in part. See response to paragraph 6.

8. Denied. Debtor is providing adequate protection through regular monthly payments. To the extent that the monthly payments are in arrears, Debtor will make an offer in the near future to bring same current.

9. Admitted in part and denied in part. Movant is not entitled to fees and costs since the amount of Movant's claim exceeds the fair market value of the property. 11 U.S.C. § 506(b), United Savings Association v. Timbers of Inwood Forest Assocs., Ltd., 484 U.S. 365 (U.S. Supreme Court 1988).

**WHEREFORE**, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum  
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DATED: 3-17-21

**CERTIFICATION OF SERVICE**

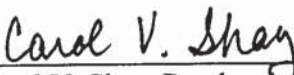
I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S RESPONSE TO MOTION OF U.S. BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF CVI LCF MORTGAGE LOAN TRUST I, BY ITS SERVICER NEWREZ LLC, D/B/A SHELLPOINT MORTGAGE SERVICING FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J. DEHART III, ESQUIRE  
CHAPTER 13 TRUSTEE  
VIA E-SERVICE

dehartstaff@pamd13trustee.com

REBECCA A. SOLARZ, ESQUIRE  
KML LAW GROUP, P.C.  
COUNSEL FOR MOVANT  
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

  
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For Debtor

DATED: 3/17/2021